

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS.

F & D INTERNATIONAL TRADING,  
INC.

Plaintiff,

v.

ADEWALE ADEBAYO d/b/a BISBAY  
HOLDINGS INTERNATIONAL.

Defendant

**ANSWER TO VERIFIED COMPLAINT**

1. Defendant is without knowledge or information sufficient to enable him to admit or deny the allegations contained in paragraph 1 of plaintiff's complaint, and therefore, denies those allegations

2. Defendant admits the allegations contained in paragraph 2 of plaintiff's complaints

3. Defendant admits the allegations contained in paragraph 3 of plaintiff's complaints

4. Defendant admits the allegations contained in paragraph 4 of plaintiff's complaints

5. Defendant states that as to the obligations of the parties to the agreement, the documents speak for themselves, and otherwise denies the allegations contained in paragraph 5 of plaintiff's complaints

6. Defendant admits the allegations contained in paragraph 6 of plaintiff's complaints

7. Defendant admits the allegations contained in paragraph 7 of plaintiff's complaints

8. Defendant admits the allegations contained in paragraph 8 of plaintiff's complaints

9. Defendant admits the allegations contained in paragraph 9 of plaintiff's complaints

10. Defendant admits the allegations contained in paragraph 10 of plaintiff's complaints

11. Defendant admits the allegations contained in paragraph 11 of plaintiff's complaints

12. Defendant is without knowledge or information sufficient to enable him to admit or deny the allegations contained in paragraph 12 of plaintiff's complaint, and therefore, denies those allegations

13. Defendant admits SGS was to inspect the materials for weight and quality but, defendant is without knowledge or information sufficient to enable him admit or deny the rest of the allegations contained in paragraph 13 of plaintiff's complaint, and, therefore denies those allegations

14. Defendant admits that the SGS and CCIC provided to him, and on which he reasonably relied, have been identified as forgeries, denies that he knew or should have known that fact at the time, and otherwise denies the allegations contained in paragraph 14 of plaintiff's complaint

15. Defendant admits that plaintiff has made demands but denies the liability for those demands

Wherefore, Defendant, requests that plaintiff's complaints be dismissed and the defendants be awarded his costs.

#### Count II

16. Defendant is without knowledge or information sufficient to enable him to admit or deny the allegations contained in paragraph 16 of plaintiff complaints, and therefore, denies those allegations

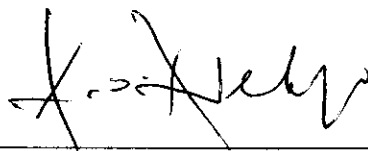
17. Defendant is without knowledge or information sufficient to enable him to admit or deny the allegations contained in paragraph 17 of plaintiff complaints, and therefore, denies those allegations

18. Defendant is without knowledge or information sufficient to enable him to admit or deny the allegations contained in paragraph 18 of plaintiff complaints, and therefore, denies those allegations

#### AFFIRMATIVE DEFENSES

1. Plaintiff's Complaint fails to state a claim on which relief can be granted.
2. Plaintiff's claims are barred by release, waiver, and unclean hands.
3. Plaintiff's claims are barred by his contributory fault and intervening conduct of third parties beyond the control or responsibility of defendant.

Wherefore, defendant requests this court cause to be unattached funds standing in the name of the defendant and Bisbay Holdings International at Fleet National Bank and the defendants awarded his costs.

A handwritten signature in black ink, appearing to read 'A. Adebayo', is written over a horizontal line.

Adewale Adebayo  
Bisbay Holdings International  
6 Pleasant Street, Suite 404  
Malden, MA 02148  
Tel: 781-397-1900

Dated: March 29, 2004